The Honorable Thomas S. Zilly

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

HIGH MAINTENANCE BITCH, LLC, a Washington Limited Liability Company Plaintiff, v. UPTOWN DOG CLUB, INC., a Texas Corporation Defendant.	Civil Action No. C07-0888-RSL **PLAINTIFF'S RESPONSE TO DEFENDANT'S MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION & IMPROPER VENUE AND FOR A DEFINITIVE STATEMENT** NOTE ON MOTION CALENDAR: AUGUST 17, 2007 ORAL ARGUMENT REQUESTED

Danny Bronski
The Grand Central Building
216 First Ave S. Ste 110
Seattle, WA 98104

Dockets.Justia.com

I. INTRODUCTION

Damages in this patent infringement case are uncertain and Defendant Uptown Dog Club, Inc ("Uptown Dog") has refused to provide credible evidence to support its general allegations that damages are minimal. *See Concurrently filed Declaration of Danny Bronski.* Plaintiff High Maintenance Bitch, LLC ("HMB") has reason to believe that damages are significant given, among other things, Uptown Dog's own statements from its website and Uptown Dog's advertisements within a host of national media including BETTER HOMES AND GARDENS, SEATTLE DOG MAGAZINE, PEOPLE, HBO, THE NEW YORK TIMES, YAHOO!, and THE WASHINGTON POST. *See Concurrently filed Declaration of Danny Bronski.* Rather than providing credible documentation that would both support the allegedly minimal damages and facilitate prompt settlement of this case, Uptown Dog has entrenched itself in legal argument and significantly increased attorney fees for both parties by filing this motion. Such a course of action further supports HMB's belief that damages are more extensive than Uptown Dog currently admits.

With regard to the motion to dismiss, HMB is able to set forth a prima facie case for personal jurisdiction and venue and therefore requests that the Court deny Uptown Dog's motion to permit HMB an opportunity to gather more evidence supporting personal jurisdiction and venue through discovery. With regard to the motion to transfer venue, Uptown Dog has failed to meet its "very substantial burden" of demonstrating that transfer is appropriate and therefore HMB requests that the Court deny Uptown's motion

Danny Bronski
The Grand Central Building
216 First Ave S. Ste 110
Seattle, WA 98104

to transfer venue. With regard to Uptown Dog's motion for a more definite statement, HMB requests that this motion be denied to permit HMB an opportunity to learn more about Uptown Dog's product offerings and sales through discovery.

II. PERSONAL JURISDICTION HAS BEEN ESTABLISHED

A. Issue

The issue is whether HMB is able to state a prima facie case of personal jurisdiction and whether the court should permit HMB an opportunity to discover additional facts that support personal jurisdiction.

B. Prima Facie Case for Jurisdiction

HMB has filed a complaint against Uptown Dog for patent infringement. No answer has been filed to the complaint and no discovery has been conducted by either party. "It is well established that where the district court relies solely on affidavits and discovery materials, the plaintiff *need only establish a prima facie case of jurisdiction*." *Fields v. Sedgwick Associated Risks, LTD.*, 796 F.2d 299, 301 (9th Cir. 1986) (emphasis added); *See also Data Disc, Inc. v. Systems Technology Associates, Inc.*, 557 F.2d 1280, 1285 (9th Cir. 1977) ("[A] plaintiff must make only a prima facie showing of jurisdictional facts through the submitted materials in order to avoid a defendant's motion to dismiss").

C. Opportunity For Jurisdictional Discovery

Moreover, "Although the plaintiff bears the burden of demonstrating facts that support personal jurisdiction, *courts are to assist the plaintiff by allowing jurisdictional discovery* unless the plaintiff's claim is clearly frivolous." *Massachusetts School of Law at Andover, Inc. v.*

Danny Bronski
The Grand Central Building
216 First Ave S. Ste 110
Seattle, WA 98104

American Bar Association, 107 F.3d 1026, 1042 (3rd Cir. 1997) (emphasis added). "If a plaintiff presents factual allegations that suggest with reasonable particularity the *possible existence of the requisite contacts* between the party and the forum state, the plaintiff's right to conduct jurisdictional discovery should be sustained." *Toys R Us, Inc. v. Step Two, SA,* 318 F.3d 446, 456 (3rd Cir, 2003) (emphasis added).

D. HMB Has Established Prima Facie Personal Jurisdiction over Uptown Dog

The determination of whether the Court can exercise personal jurisdiction is controlled by a two-part inquiry: (1) whether jurisdiction is permitted by the forum state's long-arm statute; and (2) whether jurisdiction is consistent with the defendant's right to Constitutional Due Process. *International Shoe. V. Washington*, 326 U.S. 310, 316 (1945).

The relevant portion of Washington's long-arm statue, identifying acts that subject a defendant to jurisdiction, reads as follows:

RCW 4.28.185. Personal service out of state – Acts submitting person to jurisdiction of courts – Saving

(1) Any person, whether or not a citizen or resident of this state, who in person or through an agent does any of the acts in this section enumerated, thereby submits said person, and, if an individual, his personal representative, to the jurisdiction of the courts of this state as to any cause of action arising from the doing of any said acts:

(a) The transaction of any business within this state;

Danny Bronski
The Grand Central Building
216 First Ave S. Ste 110
Seattle, WA 98104

….

Washington State's long-arm statue extends to limits of federal due process and is coextensive with outer limits of due process. Thus, in determining whether personal jurisdictions can be exercised over a nonresident defendant, the Court is required only to analyze whether such exercise would comport with due process. *Chan v. Society Exhibitions, Inc.*, 39 F.3d 1398 (9th Cir. 1994), *cert. denied*, 514 U.S. 1004 (1995). Thus, the two-step inquiry folds into one: whether the exercise of personal jurisdiction is consistent with Constitutional Due Process.

Federal Circuit law governs the personal jurisdiction analysis in patent cases. *Beverly Hills Fan Co. v. Royal Sovereign Corp.*, 21 F.3d 1558, 1564 (Fed. Cir. 1994), *cert. dismissed*, 115 S. Ct. 118 (1994). There are two kinds of personal jurisdiction – specific and general. Specific jurisdiction arises out of or relates to the cause of action even if those contacts are isolated and sporadic. General jurisdiction arises when a defendant maintains continuous and systematic contacts with the forum state even when the cause of action has no relation to those contacts. *LSI Indus v. Hubbell Lighting, Inc.*, 232 F.3d 1369, 1375 (Fed. Cir. 2000) (*quoting, Burger King Corp. v. Rudzewicz*, 471 U..S. 462 (1985) and *Helicopteros Nacionales de Columbia, S.A. v. Hall*, 466 U.S. 408, 414 (1984)).

1. Specific Jurisdiction Exists in this Case

In determining whether specific jurisdiction exists, the nonresident must have minimum contacts with the forum state such that it should reasonably anticipate being haled into court there. *World-Wide Volkswagen Corp. v. Woodson*, 444 U.S. 286, 299 (1980).

Danny Bronski
The Grand Central Building
216 First Ave S. Ste 110
Seattle, WA 98104

Whether minimum contacts exist is determined by examining whether the defendant has purposefully availed itself of the privilege of conducting activities within the form thereby invoking the benefits and protections of its laws. *Hanson v. Denckla*, 357 U.S. 235, 253 (1958). Next, specific jurisdiction is proper when the factual basis for the complaint arises out of or relates to the forum and creates a substantial connection with the forum. *Red Wind Shoe Co. Inc. v. Hockerson-Halberstadt, Inc.,*, 148 F.3d 1355, 1359 (Fed. Cir. 1998) (citing *Burger King Corp. v. Rudzewicz,* 471 U.S. 462 (1985) and *Helicopteros Nacionales de Columbia, S.A. v. Hall*, 466 U.S. 408, 414 (1984)). Additionally, Constitutional Due Process requires that exercise of jurisdiction over the defendant does not offend traditional notes of fair play and substantial justice. *Asahi Metal Indus. Co. v. Superior Court*, 480 U.S. 102, 113 (1987); *World-Wide Volkswagen Corp. v. Woodson*, 444 U.S. 286, 292 (1980).

Accordingly, the Federal Circuit has outlined a three-prong test for determining whether specific jurisdiction exists: (1) the defendant purposefully directed its activities at the residents of the forum; (2) the claim arises out of or is related to those activities; and (3) assertion of personal jurisdiction is reasonable and fair. *HollyAnne Corp. v. TFT, Inc.*, 199 F.3d 1304, 1307 (Fed. Cir. 1999) (*citing Akro Corp. v. Luker*, 45 F.3d 1541, 1545 (Fed. Cir. 1995)); *Electronics For Imaging, Inc. v. Coyle,* 340 F.3d 1344, 1350 (Fed. Cir. 2003).

a. A prima facie case for specific jurisdiction exists over Uptown Dog because infringement claims arise out of purposeful directed activities

Uptown Dog purposefully directs its activities towards Washington residents. First, Uptown Dog's website includes a selection for shipping its products into

Danny Bronski
The Grand Central Building
216 First Ave S. Ste 110
Seattle, WA 98104

Washington along with shipping rates into Washington. *See Concurrently filed Declaration of Danny Bronski.* Second, in contradiction to Uptown Dog's statement that "Uptown Dog did not conduct any business solicitations in Washington," (*Defendant's Motion at Page 16, Line 11*) Uptown Dog indicates on its website that it advertises through an extensive number of national media channels intended to target Washington residents including SEATTLE DOG MAGAZINE, BETTER HOMES & GARDENS, PEOPLE, US WEEKLY, STARNEWS, YAHOO!, THE WASHINGTON POST, DAILY NEWS, PURINA, HBO, THE NEW YORK TIMES, and DAILY HERALD. *See Concurrently filed Declaration of Danny Bronski.* Some of this media targets Washington residents specifically and directly (e.g. SEATTLE DOG MAGAZINE) while all of the other media cited are widely circulated and read by Washington residents. Other lesser known media channels that Uptown Dog has appeared in and that may also target Washington residents include MILLIONAIRE, DOG FANCY, OK!, BARK, MODERN DOG, URBAN DOG, NEW YORK DOG, HOLLYWOOD DOG, WAG, FIDO FRIENDLY, PAMPERED PUPPY, LUCKY DOG, DAILY KIBBLE, DOG LIFE, NAPLES DOG, DATEMYPET.COM, CHICAGOLAND TAILS, AKC.ORG, DOGGEEK.COM, DFW DOG, FLORIDA DOG, WAG MAGAZINE, PHOENIX HOME & GARDEN, DOG LIVING, URBAN DOG, and various SEARCH ENGINES. *See Concurrently filed Declaration of Danny Bronski.*

The claims for patent infringement in this case arose out of these purposefully directed activities. HMB believes that Uptown Dog has made sales of patented products to Washington residents in relation to Uptown Dog's extensive national marketing.

Danny Bronski
The Grand Central Building
216 First Ave S. Ste 110
Seattle, WA 98104

Uptown Dog has confirmed this belief by responding in the affirmative as to whether possible patented products are shipped by Uptown Dog into Washington (*See Concurrently filed Declaration of Danny Bronski):*

> Live Uptown Dog Website Chat Operator: May I help you?
>
> Visitor: Hi, I'm interested in purchasing one of each of the boas that you have – I see that you are in Texas, *do you routinely ship into Washington?*
>
> Live Uptown Dog Website Chat Operator: *We ship all over the USA*

HMB respectfully submit that these factual allegations suggest with more than reasonable particularity the possible existence of requisite contacts between Uptown Dog and Washington as required under the law. *Toys R Us, Inc. v. Step Two, SA*, 318 F.3d 446, 456 (3rd Cir, 2003). If necessary, HMB requests that this Court assist by allowing further jurisdictional discovery as permitted by *Massachusetts School of Law at Andover, Inc. v. American Bar Association,* 107 F.3d 1026, 1042 (3rd Cir. 1997).

b. **A prima facie case for specific jurisdiction over Uptown Dog is also reasonable and fair**

Reasonableness of exercising personal jurisdiction is determined by balancing several factors, including: (1) the burden on the defendant; (2) the interests of the forum state; (3) the plaintiff's interest in obtaining relief; (4) the interstate judicial system's interest in obtaining the most efficient resolution of controversies, and (5) the interests of the states in furthering their social policies. *Viam Corp. v. Iowa Export-Import Trading Co.,*

Danny Bronski
The Grand Central Building
216 First Ave S. Ste 110
Seattle, WA 98104

84, F.3d 424, 429 (Fed. Cir. 1996) (*citing World-Wide Volkswagen v. Woodson*, 444 U.S. 286, 292 (1980)).

Here, the burden of personal jurisdiction on Uptown Dog is reasonable, and the arguments offered to the contrary are suspect. Through counsel, Uptown Dog has characterized itself as "a small-time seller of pet products" with "two part time-employees" operating from a home. *Defendant's Motion to Dismiss at page 8*. However, Uptown Dog is not a local business, but rather one with a clear national presence. In fact, Uptown Dog has offered no evidence of a local sales presence in Frisco, Texas (such as a retail location) at all. Upon information and belief, all or nearly all of Uptown Dog's sales are generated by a website accessible anywhere and marketed primarily (if not exclusively) through national channels. *See Concurrently filed Declaration of Danny Bronski.* Furthermore, Uptown Dog is not as small as it would like the Court to believe. Uptown Dog's website indicates a team of at least eight employees, including a Vice President & Director of Operations, an Executive Director, an Order Processor, a Shipping and Purchasing Manager, a Graphic Designer, a Product Photographer, a Website Host and Consultant, and an E-marketing Consultant. *See Concurrently filed Declaration of Danny Bronski.* Additionally, Uptown Dog indicates that all merchandise is "kept in a climate-controlled, smoke-free warehouse", which is beyond the scope of what most small businesses can afford. *See Concurrently filed Declaration of Danny Bronski.* Especially when we combined these facts, the characterization of Uptown Dog as small, local, home-based business is absurd. Because of the significance of the internet and increasing power of

Danny Bronski
The Grand Central Building
216 First Ave S. Ste 110
Seattle, WA 98104

computers, it is certainly possible that Uptown Dog operates part of its business from a home, but gone are the days where home business operation equates with insignificance, especially when they are internet-based. Whether the business is run from a home, an office, a smoke-free warehouse or some combination, in this case the scope of national advertising, large number of personnel, and fact that most or all of sales are driven by a website contradict Uptown Dog's characterization of its operations as small or local and suggest that it has almost surely established the requisite contacts with Washington and has availed itself of personal jurisdiction in Washington, especially when the standard for jurisdictional discovery is "the *possible existence of the requisite contacts* between the party and the forum state".

Also, while Uptown Dog argues that it "does not have the financial resources to litigate in a distant forum", litigation expenses are much less a factor in this case than in a typical patent case. Fortunately, in this patent infringement dispute, the claim for infringement is based upon three design patents, which do not have word-based claims that require extensive hearings and experts to determine their scope and an independent claim-by-claim analysis of validity and infringement. Instead, all that is required is for an accused product to be visually compared with claimed drawings, a much simpler task.

In contrast to Uptown Dog's claims, HMB's interest in resolving the dispute in Washington is substantial, and denying it this opportunity would be unfair and unreasonable. HMB is a small, local business which developed three creative designs for dog collars and spent tens of thousands of dollars to protect them through the channels

Danny Bronski
The Grand Central Building
216 First Ave S. Ste 110
Seattle, WA 98104

afforded by congress, namely Title 35 of the United States Code. HMB basically created a market for a certain type of dog collar with its patented designs and through the exposure it received for its creativity if now finds that there is widespread and rampant infringement of its patents nationwide. Infringement of its patents is widely dispersed and HMB's only remedy is within the federal courts. Unfortunately, HMB does not have the resources to litigate across the nation and most of the infringers of HMB patents are not large corporations, and thus we believe that *each them is likely to claim that their burden for distant litigation is excessive. See Concurrently filed Declaration of Lori Pacchiano.* Even if HMB could afford to litigate one case in Texas (and it can't), it certainly cannot afford to litigate in every defendant's local forum. Thus, granting Uptown Dog's motion to transfer has the cumulative effect of denying HMB any relief against widespread infringement of its valid patents. If the Court grants this motion, it will have the cumulative effect of denying HMB any relief for legitimate patent infringement claims. This denial of relief has ramifications beyond this case including dis-incentivizing all relatively small time inventors from participating in the patent process and contributing the public domain, which was the original intent of the U.S. Constitution. 35 U.S.C. 101 (granting patents to *authors* for their inventions). Accordingly, social policies favor exercise of personal jurisdiction over Uptown Dog.

Lastly, the interstate judicial system's interest in efficient resolution of controversies is satisfied by denying Uptown Dog's motion to dismiss. Uptown Dog alleges that damages are only $100. *Defendant's motion to dismiss at page 7, line 3.* Clearly, if this is true, the most

Danny Bronski
The Grand Central Building
216 First Ave S. Ste 110
Seattle, WA 98104

efficient resolution of the controversy would be for Uptown Dog to provide documentation of such insignificant sales so that this matter can be settled and dismissed rather than prolonged. We have offered them that opportunity.

III. VENUE IS PROPER

Uptown Dog's motion for improper venue is dependent upon its argument for personal jurisdiction, which HMB has established. Since HMB has established, at the very least, the *possible existence of the requisite contacts* between the party and the forum state required for jurisdictional discovery, this motion should be denied.

IV. VENUE SHOULD NOT BE TRANSFERRED

Uptown Dog's motion to transfer venue should be denied because it has not met its "very substantial burden" of showing that transfer is appropriate. A court should not lightly disturb a plaintiff's choice of forum. *Northern Acceptance Trust 1065 v. Gray,* 423 F.2d 653, 654 (9th Cir. 1970), cert. denied, 398 U.S. 939 (1970). A defendant seeking a transfer bears the burden of showing that the action should be transferred under § 1404(a). See *Jones v. GNC Franchising, Inc.,* 211 F.3d 495, 499 (9th Cir. 2000); *Commodity Futures Trading Comm'n v. Savage*, 611 F.2d 270, 279 (9th Cir. 1979) (movant "had the burden to justify by particular circumstances that the transferor forum was inappropriate"). Indeed, Defendants "must make a strong showing of inconvenience to warrant upsetting [a Plaintiff's] choice of forum." *Decker Coal Co. v. Commonwealth Edison Co.,* 805 F.2d 834, 843 (9th Cir. 1986); *Hoffman v. Blaski*, 363 U.S. 335, 366 (1960) ("[T]he defendant must satisfy a very substantial burden of demonstrating where justice and convenience lie, in order to

Danny Bronski
The Grand Central Building
216 First Ave S. Ste 110
Seattle, WA 98104

have his objection to a forum of hardship, in the particular situation, respected."). A showing that the transfer would merely shift – rather than eliminate or reduce – the inconvenience is insufficient. *Decker Coal Co.*, 805 F.2d at 843.

To support a motion for transfer, the moving party must establish: (1) that venue is proper in the transferee district; (2) that the transferee district is one where the action might have been brought; and (3) that the transfer will serve the convenience of the parties and witnesses and will promote the interests of justice. *Goodyear Tire & Rubber Co. v. McDonnell Douglas Corp.,* 820 F. Supp. 503, 506 (C.D. Cal. 1992). The party bringing the motion to transfer has the burden of showing a "clear balance of inconveniences" against it if the action remains in the original venue. *Futures Trading Comm'n v. Savage*, 611 F.2d 270, 279 (9th Cir. 1979). A motion to transfer should be denied if the moving party merely prefers another forum, or if the result of transfer would merely be to shift the inconvenience of litigation from one party to another. *Van Dusen v. Barrack*, 376 U.S. 612, 645-46 (1964).

In determining the convenience of the parties and witnesses and the interests of justice, a court may consider a number of factors including: (1) the plaintiff's choice of forum; (2) the convenience of the parties; (3) the convenience of the witnesses; (4) ease of access to the evidence; (5) familiarity of each forum with the applicable law; (6) feasibility of consolidation of other claims; (7) any local interest in the controversy; and (8) the relative court congestion and time of trial in each forum. *Jones*, 211 F.3d at 498.

Danny Bronski
The Grand Central Building
216 First Ave S. Ste 110
Seattle, WA 98104

In an attempt to meet its "very substantial burden" of transfer, Uptown Dog's primary arguments emphasize the size and "center of gravity" of Uptown Dog and the convenience of one potential witness who may have some minor issues with mobility. *See Defendant's motion.* Defendant's arguments, even if viewed in the best possible light, would merely shift the inconvenience of litigation to HMB, which cannot afford to litigate in Texas and thus would have to forgo its legitimate claims of patent infringement.

As previously emphasized, Uptown Dog is subject to personal jurisdiction in Washington and HMB's interest in resolving the dispute in Washington is substantial. HMB is a small, local business which developed three creative designs for dog collars and spent tens of thousands of dollars to protect them through the channels afforded by congress, namely Title 35 of the United States Code. HMB basically created a market for a certain type of dog collar with its patented designs and through the exposure it received for its creativity if now finds that there is widespread and rampant infringement of its patents nationwide. Infringement of its patents is widely dispersed and HMB's only remedy is within the federal courts. Unfortunately, HMB does not have the resources to litigate across the nation and most of the infringers of HMB patents are not large corporations, and thus we believe that *each them is likely to claim that their burden for distant litigation is excessive. See Concurrently filed Declaration of Lori Pacchiano.* Even if HMB could afford to litigate one case in Texas (and it can't), it certainly cannot afford to litigate in every defendant's local forum. Thus, granting Uptown Dog's motion to transfer has the cumulative effect of denying HMB any relief against widespread infringement of its valid

Danny Bronski
The Grand Central Building
216 First Ave S. Ste 110
Seattle, WA 98104

patents. Denial of relief has ramifications beyond this case including dis-incentivizing all relatively small inventors from participating in the patent process and contributing the public domain, which was the original intent of the U.S. Constitution. 35 U.S.C. 101 (granting patents to *authors* for their inventions). Accordingly, Uptown Dog has not met its "very substantial burden" of transfer and the equities of the case demand that this case be litigated in Washington.

V. NO LEGAL BASIS FOR MORE DEFINITE STATEMENT

Uptown Dog argues that the Court should order HMB to furnish a more definite statement of its claim for patent infringement. Uptown Dog offers no credible legal basis for this argument and thus there is no justification for the court to grant this motion. To the contrary, Uptown should either wait for discovery to obtain this information or acknowledge HMB's repeated attempts to facilitate the sharing of information which may lower the eventual costs of discovery for both parties; as discussed, this effort has been met with resistance. Uptown Dog has already removed certain products from its website as a direct result of this litigation (*See Defendant's motion*) and it may infer that these products are amongst the infringing ones. HMB requests that this motion be denied to permit HMB an opportunity to learn more about Uptown Dog's product offerings and sales and the nature and extent of infringement through discovery.

Danny Bronski
The Grand Central Building
216 First Ave S. Ste 110
Seattle, WA 98104

VI. CONCLUSION

For the foregoing reasons, HMB requests that the Court deny Uptown Dog's motion in its entirety and permit HMB an opportunity to gather more evidence about Uptown Dog's product offerings, sales and the nature and extent of infringement through jurisdictional discovery. With regard to the motion to dismiss, HMB is able to set forth a prima facie case for personal jurisdiction and venue and therefore requests that the Court deny Uptown Dog's motion to permit HMB an opportunity to gather more evidence supporting personal jurisdiction and venue through discovery. With regard to the motion to transfer venue, Uptown Dog has failed to meet its "very substantial burden" of demonstrating that transfer is appropriate and therefore HMB requests that the Court deny Uptown's motion to transfer venue. With regard to Uptown Dog's motion for a more definite statement, this motion has no legal basis and HMB requests that this motion be denied to permit HMB an opportunity to learn more about Uptown Dog's product offerings and sales and the nature and extent of infringement through discovery.

DATED this 13th day of August, 2007.

/s/ Daniel M Bronski

Danny Bronski, WSBA #34385
Jim Ruttler, WSBA #37834
Attorneys for Plaintiff HMB

Danny Bronski
The Grand Central Building
216 First Ave S. Ste 110
Seattle, WA 98104

CERTIFICATE OF SERVICE

I hereby certify that on the 13th day of August, 2007, the foregoing Plaintiff's Response To Defendant's Motion And Memorandum To Dismiss For Lack Of Personal Jurisdiction Pursuant To Civil Rule 12(B)(2) And Improper Venue, Or Alternatively To Transfer And For Plaintiff To Provide A More Definite Statement was filed with the Court using the CM/ECF system which will send notification of such filing to the following:

Steven P. Fricke
Attorney for Defendants
Townsend and Townsend and Crew LLP
1420 Fifth Avenue, Suite 4400
Seattle, WA 98101-2325
spfricke@townsend.com
Executed on August 13, 2007.

/s/ Daniel M. Bronski

____

Danny Bronski
The Grand Central Building
216 First Ave S. Ste 110
Seattle, WA 98104